

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JAN 29 2014

David J. Brazzley, Clerk of Court

UNITED STATES OF AMERICA

v.

KAREN SIMMONS

§
§
§
§
§
§

CRIMINAL NO.

14-0046

INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION

At all times material herein:

1. The United States Department of Veterans Affairs is a department and agency of the United States, whose mission is to care for the U.S. military veterans and their dependents. In furtherance of this mission, the VA runs the largest hospital system in the United States, and administers a wide range of financial benefit programs.

COUNT ONE

(Theft of Government Property – 18 U.S.C. § 641)

INTRODUCTION

1. The Grand Jury adopts, re-alleges, and incorporates herein the allegations in paragraph 1 of the Introduction of this Indictment as if set out fully herein.

2. On or about July 7, 2007, and continuing thereafter until July 1, 2010, the exact dates being unknown to the Grand Jury, in the Houston Division of the Southern District of Texas and

elsewhere,

KAREN GENOICE SIMMONS

the defendant herein, did knowingly steal and convert to her own use, money and property of the United States in an amount over \$1,000.00, in violation of Title 18, United States Code, Section 641.

A TRUE BILL
Original Signature on File
FOREPERSON

KENNETH MAGIDSON
UNITED STATES ATTORNEY


TINA ANSARI
ASSISTANT UNITED STATES ATTORNEY